

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

Alexander E. Jones,
Debtor,

Bankruptcy
Case No. 22-33553 (CML)

Chapter 11

David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, Robert Parker, and Richard M. Coan, as Chapter 7 Trustee for the Estate of Erica Lafferty

Plaintiffs,

v.

Alexander E. Jones and Free Speech Systems, LLC,
Defendants.

Adv. Pro. No.: 22-03037 (CML)

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

NOTICE PURSUANT TO LR 9013-1:

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Plaintiffs David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, Robert Parker, and Richard M. Coan, as chapter 7 trustee for the estate of Erica Lafferty hereby move for summary judgment for a

declaratory judgment that the \$1,438,139,556 debt owed to them from the judgments entered in the three consolidated cases of *Lafferty, et al. v. Jones, et al.*, Case No. X06-UWY-CV-18-6046436-S, in the Superior Court of Connecticut, Judicial District of Waterbury; *Sherlach v. Jones, et al.*, Case No. X06-UWY-CV-18-6046437-S, in the Superior Court of Connecticut, Judicial District of Waterbury; and *Sherlach, et al. v. Jones, et al.*, Case No. X06-UWY-CV-18-6046438-S, in the Superior Court of Connecticut, Judicial District of Waterbury, is not dischargeable pursuant to 11 U.S.C. § 523(a)(6).

For the reasons more fully set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Summary Judgment, Statement of Uncontested Material Facts in Support of Plaintiffs' Motion for Summary Judgment, and the Declaration of Alinor C. Sterling in Support of Plaintiffs' Motion for Summary Judgment, all attached hereto, Plaintiffs pray that the Court grant their motion, issue an order declaring that the judgments are not dischargeable, and grant all other relief the Court deems appropriate under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was filed and served on all persons entitled to receive notice via operation of this Court's CM/ECF system on May 12, 2023.

/s/ Ryan E. Chapple

Ryan E. Chapple